

SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

NOV 10 2021
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
KAYLA ROBERTS,)
)
Defendant.)

4:21CR00615 SEP/PLC

INDICTMENT

COUNT I
(Bank Fraud)

The Grand Jury charges that:

1. On or about June 25, 2021, in the Eastern District of Missouri,

KAYLA ROBERTS,

the Defendant herein, did knowingly and intentionally execute a scheme to defraud Capital One, a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation, of money owned and under the custody of Capital One, by means of false and fraudulent pretenses, and representations.

In violation of, and punishable under, Title 18, United States Code, Section 1344.

COUNT II
(Aggravated Identity Theft)

The Grand Jury further charges that:

2. On or about June 25, 2021, in the Eastern District of Missouri,

KAYLA ROBERTS,

the Defendant herein, during and in relation to the crime charged in Count I, did knowingly and intentionally possess and use, without lawful authority, a means of identification of another person, to wit the name and access device of R.H.

In violation of, and punishable under, Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
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JOHN J. WARE, #40880MO
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